

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

)	
In the Matter of)	
)	
Digital Audio Broadcasting Systems)	MM Docket No. 99-
325		
And Their Impact on the Terrestrial Radio)	
Broadcast Service)	
)	
)	

**COMMENTS OF THE WALT DISNEY COMPANY
AND ABC, INC.**

The Walt Disney Company and ABC, Inc. (“Disney/ABC”) file these comments to urge the FCC to adopt the iBiquity In-band/On-channel Digital Radio Broadcasting Standard known as “NRSC-5.” Disney/ABC’s comments are filed in response to the FCC’s public notice dated June 16, 2005 that solicited public comment on the NRSC-5 Standard, which was developed by the National Radio Systems Committee and submitted jointly to the FCC by the Consumer Electronics Association and the National Association of Broadcasters.

ABC, Inc. is an indirect subsidiary of The Walt Disney Company, and owns (directly and through subsidiaries) over 60 commercial radio broadcast stations in the United States. In the interest of full disclosure, the Commission should be aware that ABC (as well as several other

broadcasters) holds an ownership interest in iBiquity, the owner of the IBOC digital radio technology approved by the FCC for digital radio. Currently, ABC is in the midst of its own digital radio transition and is aggressively rolling out the Digital In Band On Channel technology on ABC's FM and AM stations. ABC also has been involved in the standard-setting process that led to the submission of the NRSC-5 Standard to the FCC.

As Disney/ABC has stated in earlier comments filed in this proceeding, digital radio is critical to the continued vitality of terrestrial radio broadcasting in the United States. Digital radio will be of dramatically better quality and reliability than analog FM or AM. It will enable listeners to receive additional enhanced services not available today. It is therefore not surprising that Disney/ABC is eager to transition its stations to digital so that it can give listeners a better radio experience – and thus remain competitive with other terrestrial radio stations as well as satellite radio.

ABC has previously filed comments to support the expeditious roll-out of IBOC and to urge adoption by the FCC of the IBOC technical standards that have been developed thus far. In the instant comments, ABC reiterates the need for the FCC to move quickly to adopt the NRSC-5 Standard given that ABC currently is in the midst of its own transition to IBOC. Thus far, ABC Radio's experience with IBOC has been positive and promising, but swift Commission action to adopt a uniform standard – and specifically NRSC-5 -- would give much greater certainty to broadcasters like ABC, who

are expending significant resources to convert their FM and AM stations to IBOC. ABC's engineers have been involved in the development of the NRSC-5 Standard and have concluded that it is the appropriate technical standard for digital radio. Adoption of the NRSC-5 Standard also would provide certainty to manufacturers of IBOC receivers and equipment, which would encourage the production of IBOC equipment and further expedite the digital radio transition.

Lastly, Disney/ABC would like to reiterate a few points made in earlier comments in this proceeding. Specifically, more than a year ago, Disney/ABC recommended – among other things – that the FCC should proceed to fully authorize nighttime AM IBOC services and should adopt a flexible approach to FM multichannel services.¹ Disney/ABC continues to believe that the Commission needs to address these issues – and do so soon – in order to further the digital radio transition.

CONCLUSION

For the foregoing reasons, Disney/ABC encourages the FCC to move expeditiously to adopt the NRSC-5 Standard as well as to resolve the other issues relating to the digital radio transition that are pending before the FCC.

Respectfully submitted,

¹ Comments of The Walt Disney Company and ABC, Inc., MM Docket No. 99-325 (June 16, 2004).

Susan L. Fox
Vice President, Government Relations
The Walt Disney Company
1150 17th Street, N.W., Suite 400
Washington, D.C. 20036

Dated: July 18, 2005